



Linda Adams
Agency Secretary

California Environmental Protection Agency

Air Resources Board • Department of Pesticide Regulation • Department of Toxic Substances Control
Integrated Waste Management Board • Office of Environmental Health Hazard Assessment
State Water Resources Control Board • Regional Water Quality Control Boards



Arnold Schwarzenegger
Governor

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July 21, 2006

Robert Gallagher, Director
Ventura County Environmental Health Division
800 S. Victoria Ave.
Ventura, CA 93009-1730

Dear Mr. Gallagher:

The California Environmental Protection Agency (Cal/EPA) conducted a program evaluation of the Ventura County Environmental Health Department Certified Unified Program Agency (CUPA) on March 28, 2005. The evaluation was comprised of an in-office program review. No deficiencies were identified during the evaluation. The enclosed Unified Program Evaluation Summary of Findings has been completed to document the evaluation findings, which includes an observation and recommendation and examples of outstanding program implementation.

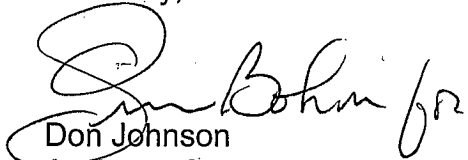
The Evaluation Summary of Findings identified no deficiencies. I have reviewed the enclosed copy of the Evaluation Summary of Findings and I find that the program performance meets or exceeds established standards.

Cal/EPA also noted during this evaluation that the Ventura County Environmental Health Department CUPA has worked to bring about a number of outstanding program implementations including being very effective in their oversight of the two Participating Agencies (PAs) in the County, the City of Santa Paula and the City of Ventura. Each year, on a regular basis, the CUPA performs comprehensive and thorough evaluations of the performance of each PA in implementing and enforcement of the authorized Unified Program elements. These evaluations are completely documented in the CUPA's annual Self-Audit Reports, which includes letters of communications, the checklists and notes used by the evaluators, and a complete summary of findings and plan of corrections for each deficiency identified during the evaluation. The CUPA management team has developed, using the Self-Audit Reports, a system to effectively manage all aspects of the Unified Program. The team performs an objective and comprehensive examination of their own performance that has been found to be a very useful system of identifying implementation obstacles or areas requiring improvement and developing direct linkage to clear and measurable methods of correction or improvement.

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Thank you for your continued commitment to the protection of public health and the environment. If you have any questions or need further assistance, you may contact Jim Bohon, Manager, Cal/EPA Unified Program at (916) 327-5097 or jbohon@calepa.ca.gov.

Sincerely,



Don Johnson
Assistant Secretary
California Environmental Protection Agency

Enclosure

cc: Mr. Greg Smith, CUPA Program Manager (Sent Via Email)
Ventura County Environmental Health Division
800 S. Victoria Ave.
Ventura, CA 93009-1730

James Gilreath, CUPA Program Supervisor (Sent Via Email)
Ventura County Environmental Health Division
800 S. Victoria Avenue
Ventura, CA 93009-1730

Ms. Marty Robinson, Director
Ventura County Resource Management Agency
800 S. Victoria Avenue
Ventura, CA 93009-1730

Ms. Loretta Sylve (Sent Via Email)
California Environmental Protection Agency
1001 I Street, 4th Floor
Sacramento, CA 95814

Mr. James Giannopoulos (Sent Via Email)
State Water Resources Control Board
P.O. Box 944212
Sacramento, California 94244-2102

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Mr. Charles McLaughlin (Sent Via Email)
Department of Toxic Substances Control
P.O. Box 806
Sacramento, CA 95812-0806

Ms. Vickie Sakamoto (Sent Via Email)
Office of the State Fire Marshal
P.O. Box 944246
Sacramento, California 94244-2460

Mr. Moustafa Abou-Taleb (Sent Via Email)
Governor's Office of Emergency Services
P.O. Box 419047
Rancho Cordova, California 95741-9047



STATE OF CALIFORNIA
ENVIRONMENTAL PROTECTION AGENCY



Linda Adams
Agency Secretary

CERTIFIED UNIFIED PROGRAM AGENCY EVALUATION
SUMMARY OF FINDINGS

Arnold
Schwarzenegger
Governor

CUPA: Ventura County Environmental Health Division

Evaluation Date: March 28, 2005

EVALUATION TEAM

Cal/EPA: John Paine

This Summary of Findings includes program observations, with recommendations for program improvement, and examples of outstanding program implementation. Cal/EPA identified no deficiencies during the office visit. Questions or comments can be directed to John Paine at (916) 327-5092.

PROGRAM OBSERVATIONS AND RECOMMENDATIONS

- 1. Observation:** The CUPA is diligently attempting to ensure that all agricultural facilities are being regulated, through the Agricultural Commissioners' Office. Annually, the CUPA provides the Agricultural Commissioners' Office with print-outs of the regulated agricultural facilities. Up until recently, the Agricultural Commissioners' Office has been inspecting these facilities and collecting Hazardous Materials Business Plans. At the time of the CUPA's evaluation, the Agricultural Commissioners' Office has informed the CUPA that resources are no longer available to perform such functions. Since being informed, the CUPA management has been trying to solidify their agreement with the Agricultural Commissioners' Office.

Recommendation: The CUPA should continue working to establish a written contract, agreement, or memorandum of understanding with the Agricultural Commissioners' Office to delineate their roles and responsibilities under the Unified Program. If the Agricultural Commissioners' Office wishes to not participate in the Unified Program, the CUPA should take the appropriate steps to regulate the agricultural facilities themselves. Since the time of evaluation, the CUPA has met with the Agricultural Commissioner's Office and the Ventura County Farm Bureau on the subject. The CUPA has also corresponded with the Ventura County Board of Supervisors and is working to resolve the issue.

Certified Unified Program Agency (CUPA)
Evaluation Summary of Findings

EXAMPLES OF OUTSTANDING PROGRAM IMPLEMENTATION

1. The CUPA's annual Self-Audit Reports are excellent. Not only do they thoroughly and effectively cover all required elements, the reports go well beyond the regulatory mandate and include applicable supporting data. The Reports include a Summary of Findings and Summary of Program Elements that includes the annual evaluations of their two Participating Agencies (PAs). The CUPA management team has developed, using the Self-Audit Reports, a system to effectively manage all aspects of the Unified Program. The team performs an objective and comprehensive examination of their own performance that has been found to be a very useful system of identifying implementation obstacles or areas requiring improvement and developing direct linkage to clear and measurable methods of correction or improvement. For instance, the FY 03-04 Self-Audit Report revealed that limitations with existing data system and problems with consistent data entry by staff. To address this issue, the CUPA immediately embarked on a huge project to switch to the Envisions Database and scheduled initial and on-going data entry and data management training for all CUPA staff.
2. The CUPA has initiated several changes and modifications to their Unified Program, improving the effectiveness and efficiency of their Unified Program. Modifications to the organizational structure of the CUPA have resulted in positive outcomes and more efficient and effective operation of the CUPA. An Environmental Health Specialist IV position was reclassified to a supervisory position, resulting in more direction and support for staff in the day-to-day operations of the Unified Program. The Unified Program management team now consists of a manager and two supervisors. Additionally, the CUPA added two UST plan check positions to address the every increasing need for the UST Program element. The CUPA adopted a new ordinance aimed at permitting small quantity generators, such as silver-only and universal waste generators. To promote consolidation and consistency, the Medical Waste Program performs hazardous waste inspections at medical offices. In an effort to gauge program effectiveness and efficiency, the CUPA management team periodically reviews the results of surveys and questionnaires received from inspected regulated businesses, sharing their analysis with program staff to ensure continuous improvement of their permitting and inspection programs. The CUPA has recently embraced a new data system, Envision, developing numerous tools and standardizing many aspects of their Unified Program.
3. The CUPA Management Team, which consists of two Supervising Environmental Health Specialists, James Gilreath and James Wada, and a Program Manager, Greg Smith, have excellent command and exemplary leadership skills that have resulted in one of the best CUPA organizations throughout California. Their unyielding efforts to continuously improve their CUPA, as well as many of the other 83 CUPAs in California is greatly appreciated and applauded by the State Unified Program Agencies. Through their efforts, great leadership, and unselfish endeavors many once daunting administrative and operational tasks are now perceived as "doable" by many of their colleagues in other CUPA organizations. For example, they have established simplified and useful methods for accomplishing the most dreaded administrative burdens brought on by the Unified Program, completing and submitting the Annual Summary Reports and annual Self-Audit Reports. Due to their efforts and willingness to share their failures and successes with other CUPAs, they have demonstration proven methods collecting, tracking,

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and reporting the data necessary to complete these reports. Furthermore, they have demonstrated and shared the practical uses, both internally and externally, of both of these administrative tasks mandated by the Unified Program. The management team has employed numerous ways this data can be used to continuously improve and adequately management a large organization.

4. The Ventura County CUPA has also been very effective in their oversight of the two Participating Agencies (PAs) in the County, the City of Santa Paula and the City of Ventura. Once again they have displayed excellent leadership, direction, guidance, and oversight of the two PAs. Each year, on a regular basis, the CUPA performs comprehensive and thorough evaluations of the performance of each PA in implementing and enforcement the authorized Unified Program elements. These evaluations are completely documented in the CUPA's annual Self-Audit Reports, which includes letters of communications, the checklists and notes used by the evaluators, and a complete summary of findings and plan of corrections for each deficiency identified during the evaluation. In all cases where a PA performance evaluation has resulted in the identification of deficiencies, the CUPA performs follow-up evaluations a few months later to verify that the deficiencies were in fact corrected as planned and agreed upon.
5. The CUPA has established a very unique and effective Inspection and Enforcement Program that maximizes their use of resources while minimizing the administrative burden on inspection staff. The CUPA has transitioned into the Envision database and Field Inspection System, which shows promise in streamlining and making more consistent the issuance of inspection reports, inventory management, identification and description of violation, mandated corrective actions, tracking, and time accounting. The Field Inspection System will employ the use of "tablet" computers for inspection staff, which will allow staff to access all data on the centralized system from the field, generate pre-scripted descriptions and corrective actions for common violations, and generate inspection reports in the field. Additionally, once back in the office, they will simply synchronize their "tablets" with the main database, eliminating the need to re-entry the data from each inspection. The CUPA has consistently exceeding the state mandated frequencies for compliance inspections and plans to improve even more. The CUPA and their PAs have initiated numerous formal enforcement actions, typically through referral the District Attorney's Office, that cover all Unified Program elements. The District Attorney's Office has been very supportive and successful in handling many the CUPA's enforcement cases. The CUPA has adopted the AEO process and, at the time of evaluation, was in negotiations on the agency's first AEO Consent Order. Since the evaluation, the CUPA has completed 13 AEO actions along with continued District Attorney's Office referrals.
6. The CUPA has implemented a system of document imaging to provide web-based information, such as past inspection reports and facility information, to the general public. The document imaging system allows anyone to search public CUPA documents by clicking on web-site links and entering site information (name, address, etc.). The CUPA web-site also provides program information, forms, fact sheets and fee information to assist the regulated community. Links to statutes, regulations, ordinances, other agencies, contacts and a newsletter archive are also part of the CUPA's web-based public outreach. Additionally, the CUPA periodically publishes newsletters which are mailed to all regulated facilities and other stakeholders. The CUPA continues to develop and send informational mailings to facilities when regulations are modified or other regulatory issues arise.